

FILED
WILLIAMSPORT

SEP 21 2023

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

PER EA
DEPUTY CLERK

IN RE GEISINGER SYSTEM
SERVICES AND EVANGELICAL
COMMUNITY HOSPITAL
HEALTHCARE WORKERS
ANTITRUST LITIG.

No.: 4:21-cv-00196 (MWB)

Chief Judge Brann

MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Middle District Local Rule 5.8, Plaintiffs, by and through their undersigned counsel, hereby move for leave to file under seal an unredacted letter and exhibits. Along with this Motion, Plaintiffs submit a Statement of Justification in Support and a proposed Order.

WHEREFORE, Plaintiffs respectfully request that the Court file under seal an unredacted copy of Plaintiffs' September 20 letter to the Court, along with its attached exhibits.

Date: September 20, 2023

Respectfully submitted,

/s/ Adam J. Zapala

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Interim Co-Lead Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF CONCURRENCE

I, Michaela L. Wallin, hereby certify that concurrence was sought from counsel for Defendants Geisinger System Services and Evangelical Community Hospital in this Motion for Leave to File Under Seal. As of 4:30pm EST on September 20, 2023, counsel for Defendants have not responded to this inquiry.

Date: September 20, 2023

/s/ Michaela L. Wallin
Michaela L. Wallin

CERTIFICATE OF SERVICE

I, Michaela L. Wallin, hereby certify that a true and correct copy of the foregoing Motion for Leave to File Under Seal was served upon all counsel of record via electronic mail on this 20th day of September, 2023.

Date: September 20, 2023

/s/ Michaela L. Wallin
Michaela L. Wallin